

And the Commission found that the Vermont Board committed no clear error by accepting the same Verizon BHAR calculation. *Vermont Order* ¶ 31.

D. Benchmark Analysis.

41. Finally, as we demonstrated in our *Supplemental Declaration*, non-loop rates in New Jersey satisfy the benchmark analysis when compared to the analogous New York rates. This is true under a variety of assumptions with regard to the total DEM minutes used and the allocation of those minutes among call types, as we demonstrated in the *Garzillo/Prosini Supplemental Declaration* ¶¶ 31-34, and discuss below.

42. WorldCom contends that the benchmark analysis should only be performed using the (unrealistic) assumption that each state experiences equal usage. Verizon believes that comparison using state-specific data is more appropriate, because different states experience different usage levels, and the only way to compare what CLECs actually pay for the services they receive is to analyze rates in each state based on actual state-specific usage.

43. In any event, however, the New Jersey rates *do* satisfy the benchmark test when compared against New York rates using uniform MOU assumptions. The charts below compare non-loop rates in the two states, first assuming that each state experiences 1898 MOUs per line (the New York 2000 DEMS number), and then assuming that each state experiences 1767 MOUs per line (the New Jersey 2000 DEMS number). In each case, the New Jersey rates benchmark to New York rates. These analyses each apply the FCC's assumptions for allocating minutes among call types, as summarized in Attachment 8 to our *Supplemental Declaration*.

Non-Loop (Commission Assumptions, New York MOUs)

State	Statewide Model Cost (Non-Loop)	Statewide Average Rate (Non-Loop)	Cost Ratio to New York	Rate Ratio to New York	Compliant?
NY	\$3.50	\$5.51	100%	100%	—
NJ	\$3.55	\$5.27	101%	96%	Y

Non-Loop (Commission Assumptions, New Jersey MOUs)

State	Statewide Model Cost (Non-Loop)	Statewide Average Rate (Non-Loop)	Cost Ratio to New York	Rate Ratio to New York	Compliant?
NY	\$3.50	\$5.31	100%	100%	—
NJ	\$3.55	\$4.95	101%	93%	Y

44. On March 11, 2002, Verizon filed an ex parte in connection with its initial New Jersey application detailing how it would apply composite switching rates. The New Jersey non-loop rates presented in this Declaration reflect that composite rate. In our Supplemental Declaration (paragraph 34), the New Jersey non-loop rates that we derived using the FCC's standards assumptions to allocate the minutes of use among call types also reflect that composite rate. However, in presenting the benchmark analysis for non-loop elements utilizing Verizon's state-specific assumptions for allocating usage among call types in that Declaration, we inadvertently failed to reflect that composite rate. See *Garzillo/Prosini Supplemental Declaration* ¶ 33. The corrected chart, which shows Verizon passing the benchmark test, is presented below:

Non-Loop (State-Specific Data)

State	Statewide Model Cost (Non-Loop)	Statewide Average Rate (Non-Loop)	Cost Ratio to New York	Rate Ratio to New York	Compliant?
NY					
NJ					

45. As of July 1, 2001, the Commission no longer requires Verizon to track and report DEM usage. Therefore, Verizon reported DEM data for 2001 by combining January 2001 through June 2001 actual DEM results with one-half of the annual total DEM data from year 2000. It is still appropriate to use 2000 DEM data for benchmarking analysis. This is because growth in minutes of use per line since 2000 has been minimal. *See Attachment 5.* The increasing use of wireless communications, cable modems, and other modes of communication other than traditional wireline telephone service, have all contributed to the limited growth in minutes of use per line. But even if the growth were more in line with previous years' growth (say, 5%), New Jersey rates would still benchmark to New York rates, as demonstrated in the chart below. This chart compares non-loop rates in New York and New Jersey, assuming usage at 105% of New York's 2000 DEM data (2000 minutes of use for both New York and New Jersey). Because New York's usage levels are higher than New Jersey's, this analysis chart presents the "worst case" comparison -- that is, the comparison in which New Jersey rates would be the most likely to fail the benchmark test.

Non-Loop (Commission Assumptions, New York MOUs * 105%)

State	Statewide Model Cost (Non-Loop)	Statewide Average Rate (Non-Loop)	Cost Ratio to New York	Rate Ratio to New York	Compliant?
NY	\$3.50	\$5.68	100%	100%	—
NJ	\$3.55	\$5.52	101%	97%	Y

III. DUF Rates.

46. AT&T next complains that Verizon's daily usage file charges are too high. *See* AT&T Comments at 11. First, Verizon has not been able to identify any place in the New Jersey cost proceeding where AT&T or any other party criticized Verizon's DUF rates. The Commission rejected AT&T's attempt to raise questions regarding Verizon's DUF rates for the first time in the Vermont section 271 proceeding, holding that "it is impractical and inappropriate for us to make many of the fact-specific findings the parties seek in this section 271 review, when many of the Vermont Board's fact-specific findings have not been challenged below. As we have previously stated, we cannot conduct a *de novo* rate proceeding in a section 271 review." *Vermont Order* ¶ 20; *see also id.* ¶ 25 ("[W]e decline to overrule state factual determinations regarding specific cost study inputs that are more appropriately decided in a state rate proceeding."). The Commission should do the same thing here, especially given that AT&T has challenged Verizon's DUF rates in its motion for reconsideration of the Board's UNE Order.

47. In any event, Verizon's DUF rates in New Jersey are TELRIC-compliant. Verizon developed its DUF rates by examining the forward-looking computer processing time and labor costs associated with preparing and formatting the DUF record, transmitting the data to the CLECs, and resolving any questions or problems that might arise. *See* Attachment 6 (workpaper Tab 5.11). Verizon's DUF rate in New Jersey is \$0.00179, which includes both the network data mover and per message recording rate elements. The parties typically add these two rate elements together when discussing DUF rates.

48. AT&T complains that Verizon has not explained its assumption that Verizon's model reflects "13 full time employees" support the DUF product. *See Baranowski Declaration* ¶ 13. This number was developed by the Verizon product manager responsible for the DUF product and the supervisors of the various work groups involved in processing CLEC DUF requests. Among other things, these individuals determined the expected number of questions and errors that will be required to be investigated and resolved by Verizon workers. These workers perform functions for all of the former Bell Atlantic South jurisdictions.

49. Specifically, Verizon devotes the equivalent of six workers in the Customer Billing Organization, two information technology specialists, and five product managers to handle DUF-related questions and problems throughout the seven jurisdictions. Together, these employees are responsible for responding to CLECs' billing- and usage- related questions, requests, and complaints, including those regarding technical issues, requests for retransmission of billing information, requests for recreation of tapes containing billing information, and questions regarding usage. They also must investigate and correct errors and create the physical tape files on which DUF records are often distributed. Finally, Verizon personnel must address requests for changes in distribution type or medium, requests for changes to current business policy and practices, requests for Verizon documentation, requests for Exchange Message Interface information related to DUF files, and other customer concerns. These activities take time, and Verizon must have employees to perform them. It is, of course, entitled to recover the related labor costs.

50. AT&T next suggests that Verizon is charging the CLECs for services Verizon provides to its own end users. *See Baranowski Declaration* ¶ 14. AT&T is wrong. Verizon has carefully divided the costs associated solely with CLEC DUF records, on the one hand, and the costs that can be spread generally across all records, on the other hand. Some workers, such as those in the CLEC support category, work solely on CLEC DUF records, and the labor costs associated with those workers are appropriately spread only over DUF records. The expenses for the workers that perform the network data move functions are spread over all records processed in the data center including records concerning Verizon's end users, CLEC end users, and other Verizon records, as AT&T contends they should be. *See Attachments 7 & 8 (workpapers Tab 4.12 and 4.13).*

51. AT&T also contends that the costs Verizon recovers through the DUF rates may already be accounted for "in the expense factors within the annual cost factors for other UNEs." *Baranowski Declaration* ¶ 12. Verizon did remove from its factors the DUF costs for computer investments and the maintenance and operating costs associated with these investments, including labor costs. Verizon also removed a portion of the labor costs associated with the Central Billing Organization, one of the organizations involved in processing the DUF records, as part of its retail avoided cost study and expense factor development. Finally, even if Verizon removed the labor costs for all 13 equivalent workers contained in the DUF study, the Other Support factor would not materially change (.0446 compared to .0447). *See Attachment 9.*

52. AT&T claims that Verizon has miscalculated one small element of the DUF rate, the network data mover element, which is typically less than 20% of the per

message recording rate element. *See Baranowski Declaration* ¶ 11. Although technically correct, the effect on the overall DUF rate is in the fourth decimal place. If Verizon were to update its DUF cost study today (including correcting the mathematical error), it is likely that some changes would result in higher costs and some in lower costs. As the Commission has found, “rates may evolve over time to reflect new information on cost study inputs and changes in technology, engineering practices, or market conditions. *Vermont Order* ¶ 23 (citing *New York Order* ¶ 247; *AT&T Corp. v. FCC*, 220 F.3d at 617). The Commission went on to cite with approval the District of Columbia Circuit’s finding that:

[W]e suspect that rates may often need to be adjusted to reflect newly discovered information If new information automatically required rejection of section 271 applications, we cannot imagine how such applications could ever be approved in this context of rapid regulatory and technological change.

53. It is, therefore, the role of the New Jersey Board to determine whether the DUF rate should be changed. It is the role of this Commission, in contrast, to determine only whether the DUF rate is within the range that a reasonable application of TELRIC would produce. It is. Indeed, in approving the Vermont section 271 application, the Commission noted that the Vermont DUF rates were lower than the DUF rates in Rhode Island. *Vermont Order* ¶ 37 n.128. The DUF rates in Rhode Island and Vermont are approximately double the New Jersey DUF rates of \$0.00179. AT&T’s comparison of Verizon’s New Jersey DUF rates to the DUF rates in Pennsylvania, on the other hand, is inapt. *See AT&T Comments* at 12. The current Pennsylvania DUF rates are based on a study performed in 1996, which, among other things, significantly overstated DUF

demand. Verizon has proposed new DUF rates in Pennsylvania that are in line with the New Jersey DUF rates.

IV. Non-Recurring Service Order Charge for Subsequent Feature Changes.

54. AT&T claims that the Board-approved non-recurring service order rate of \$7.71 for a subsequent feature change is too high and incorrectly contends that the rate should be \$0.83, which the service order rate applicable to UNE platforms. *See* AT&T Comments at 18-19; *Walsh Declaration* ¶¶ 7, 10. Verizon has been unable to identify any place in the New Jersey cost proceeding record where AT&T, or any other party, raised this issue. As discussed above, the Commission should reject AT&T's attempt to raise new issues in this proceeding. AT&T, moreover, has raised the very same issue in its motion for reconsideration of the Board's UNE Order.

55. Even aside from this procedural problem, though, AT&T's argument should be rejected. The Board-approved rate for subsequent feature changes is entirely appropriate. There are many types of CLEC errors that can cause an order to fall out of Verizon's mechanized systems, requiring manual handling in the National Market Center (formerly "TISOC"). For example, CLECs sometimes ask Verizon to remove a feature that is not actually in place on a given account, or to install a feature on an account where that feature already exists. If this occurs, Verizon will incur costs to handle the order manually. In addition, Verizon may also be required to perform manual activity if a request to remove a feature falls out of Verizon's mechanized system.

56. Verizon's cost studies do not assume that every service order for a subsequent feature change will require manual handling, or that the time required to

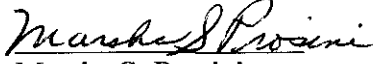
perform those orders that do require manual work will be the same in the forward-looking environment. In fact, Verizon's studies reduced the time Verizon has estimated for this activity from 95 minutes down to 12.47 minutes, spread across all orders, by applying typical occurrence and forward-looking adjustment factors. *See* Cost Studies Ex Parte (compliance non-recurring cost model, Tab 28).

57. Moreover, the New Jersey service order non-recurring charge for subsequent feature changes is *lower* than the charge recently approved in New York. The New York PSC approved forward-looking time estimates that are identical to those approved in New Jersey (a total of 12.47 minutes). These times resulted in a \$9.01 approved non-recurring charge in New York (reflecting higher labor costs in New York and different approved loadings). *See* Order on Unbundled Network Element Rates, *Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements*, Appx. C (NY PSC January 28, 2002); Attachment 10.

58. Finally, Verizon does not double recover the costs associated with subsequent feature changes. Verizon carefully excludes from its factor development all non-recurring revenues, including revenues associated with the subsequent feature change non-recurring charge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 18, 2002


Marsha S. Prosini

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 18, 2002


Patrick A. Garzillo

**SUPPLEMENTAL REPLY DECLARATION OF
PATRICK A. GARZILLO AND MARSHA S. PROSINI**

ATTACHMENT 1

APPENDIX A TO THE PRICING ATTACHMENT**VERIZON NEW JERSEY INC. and ***CLEC Acronym TXT*******A. INTERCONNECTION¹:****Service or Element Description²:****Recurring Charges:****Non-Recurring Charge:****I. Reciprocal Compensation Traffic Termination³**

Traffic Delivered at Verizon End Office

\$.001885/MOU

Not Applicable

Traffic Delivered at Verizon Tandem

\$.002863/MOU

Not Applicable

II. Entrance Facilities and Transport for Interconnection

A. Entrance facilities, and transport, as appropriate, for Interconnection at Verizon End Office, Tandem Office, or other Point of Interconnection

Per interstate [Verizon FCC 1 Sec. 6 access tariff for Feature Group D service as amended from time to time

Per interstate [Verizon FCC 1 Sec. 6] access tariff for Feature Group D service as amended from time to time

Per intrastate [Verizon NJ B.P.U. No. 2 Sec. 6] access tariff for Feature Group D service as amended from time to time

Per intrastate [Verizon NJ B.P.U. No. 2 Sec. 6] access tariff for Feature Group D service as amended from time to time

III. Exchange Access Service

Interstate

Per Verizon Tariff No. 1 as amended from time to time

Intrastate

Per Verizon Tariff B.P.U.-N.J.-NO. 2, Access Service as amended from time to time

¹ All rates and charges specified herein are pertaining to the Interconnection Attachment.² Unless a citation is provided to a generally applicable Verizon tariff, all listed rates and services are available only to ***CLEC Acronym TXT*** purchasing these services for use in the provision of Telephone Exchange Service, and apply only to Reciprocal Compensation Traffic and local Ancillary Traffic. Verizon rates and services for use by ***CLEC Acronym TXT*** in the carriage of Toll Traffic shall be subject to Verizon's tariffs for Exchange Access Service. Adherence to these limitations is subject to a reasonable periodic audit by Verizon.

As applied to wholesale discount rates, unbundled Network Elements or call transport and/or termination of Reciprocal Compensation Traffic purchased for the provision of Telephone Exchange Service or Exchange Access, the rates and charges set forth in Appendix A, incorporate the New Jersey Board of Public Utilities approved rates in Docket TX95120631 and interim rates that are subject to review by the Board. These rates shall apply until such time as they are replaced by new rates as may be approved or allowed into effect by the Board from time to time, subject however, to any stay or other order issued by any court of competent jurisdiction.

³ See the last page regarding measurement and calculation of Reciprocal Compensation Traffic termination charges.

<u>Service or Element Description:</u>	<u>Recurring Charges:</u>	<u>Non-Recurring Charge:</u>
IV. End Point Fiber Meet	To be charged in accordance with the requirements of the Interconnection Attachment, Section 3	
V. Tandem Transit arrangements for Reciprocal Compensation Traffic between ***CLEC Acronym TXT*** and carriers other than Verizon that subtend a Verizon Tandem Switch. (Not applicable to Toll Traffic when Meet Point Billing Arrangement applies; Separate trunks required for IXC subtending trunks)		Separate trunks required for IXC subtending trunks
Tandem Switching	\$.000674/MOU	Per Section II. above , as applicable
Switched Transport	\$.000085/MOU & \$.0000006/MOU/ Mile	

B. UNBUNDLED NETWORK ELEMENTS⁴**Service or Element Description:****Recurring Charges:****Non-Recurring Charge:****I. Dedicated Transport⁵**

Voice Grade/DS-0

\$23.26/Month &
\$.02/Mile/MonthAll:
\$52.74/Service Order
\$120.33/Installation

DS-1

\$27.62/Month &
\$.47/Mile/Month

\$122.14/Installation

DS-3

\$372.30/Month &
\$7.48/Mile/Month

\$167.96/Installation

DDS

\$23.26/Month
\$.02/Mile/Month

\$154.97/Installation

II. Common Transport

Tandem Switching

\$.000674/MOU

Not Applicable

Tandem-Switched Transport

\$.000085/MOU &
\$.0000006/MOU/ Mile

Not Applicable

III. Digital Cross-Connect System

Service Establishment

Not Applicable

\$2,121.13

Database Modification

Not Applicable

\$229.00/Modification
Request

Reconfiguration by Verizon personnel

Not Applicable

\$33.63/Programming
Charge/Half Hour

DS-0 Termination

\$20.00/Port/Month

\$27.51/Port

DS-1 Termination

\$69.81/Port/Month

\$34.39/Port

DS-3 Termination

\$301.85/Port/Month

\$34.39/Port

⁴ All rates and charges specified herein are pertaining to the Network Elements Attachment.

⁵ Verizon's proposed UNEs, UNE combinations, and UNE pricing methodology reflect the FCC's current rules. Verizon does not agree that UNE prices must be based solely on forward-looking costs, and Verizon reserves the right to seek to change its UNE offerings and UNE prices if the FCC's rules are vacated or modified by the FCC or by a final, non-appealable judicial decision.

Service or Element Description:**Recurring Charges:****Non-Recurring Charge:****IV. Entrance Facilities**

		<u>All:</u> \$52.74 Service Order & \$75.34 Service Order Expedited, \$6.64 Manual Surcharge & \$9.48 Manual Surcharge Expedited
2-Wire Voice Grade Channel Termination	\$9.52/Month	\$117.51/Installation \$168.65/Expedited Installation \$73.36/Premises Visit \$95.59/Expedited Premises Visit
4-Wire Voice Grade Channel Termination	\$19.59/Month	\$150.21/Installation \$215.76/Expedited Installation \$106.20/Premises Visit \$138.38/Expedited Premises Visit
DS-1 to Voice Grade Multiplexing	\$241.16/Month	\$120.49/Installation \$173.29/Expedited Installation \$0.00/Premises Visit \$0.00/Expedited Premises Visit
DS-1 Channel Termination	\$71.34/Month	\$119.34/Installation \$171.31/Expedited Installation \$106.20/Premises Visit \$138.38/Expedited Premises Visit
DS-3 to DS-1 Multiplexing	\$364.60/Month	\$159.41/Installation \$227.31/Expedited Installation \$0.00/Premises Visit \$0.00/Expedited Premises Visit

<u>Service or Element Description:</u>	<u>Recurring Charges:</u>	<u>Non-Recurring Charge:</u>
DS-3 Channel Termination	\$754.83/Month	\$163.20/Installation \$232.26/Expedited Installation \$106.20/Premises Visit \$138.38/Expedited Premises Visit
STS-1	\$576.50/Month	\$163.20/Initial Installation \$106.20/Premises Visit \$232.26 Expedited Installation/ \$138.38/Expedited Premises Visit
OC-3	\$750.40/Month	\$163.20/Initial Installation \$106.20/Premises Visit \$232.26 Expedited Installation/ \$138.38/Expedited Premises Visit
OC-12	\$2,254.65/Month	\$163.20/Initial Installation \$106.20/Premises Visit \$232.26 Expedited Installation/ \$138.38/Expedited Premises Visit

<u>Service or Element Description:</u>	<u>Recurring Charges:</u>	<u>Non-Recurring Charge:</u>
STS-1 Customer Access Ring	\$1,0005.51	
STS-1 High Speed Access Ring	\$576.50	
OC-3 Customer Access Ring	\$1,334.50	
OC-3 High Speed Access Ring	\$750.40	
OC-12 Customer Access Ring	\$2,254.65	
OC-12 High Speed Access Ring	\$2,254.65	

Service or Element Description:**Recurring Charges:****Non-Recurring Charge:****V. Interoffice Facilities**

All: Initial Service Order: \$52.74/Initial Manual Surcharge: \$6.64/Expedited Service Order: \$75.34/Expedited Manual Surcharge: \$9.48

DS-3 (Both Ends)	\$372.30/Month \$7.48/Mile	\$167.96/Initial Installation \$238.84/Expedited Installation
DS-1 (Both Ends)	\$27.62/Month \$0.47/Mile	\$122.14/Initial Installation \$175.18/Expedited Installation
Voice Grade (Both Ends)	\$23.26/Month \$0.02/Mile	\$120.33/Initial Installation \$172.55/Expedited Installation
DDS (Both Ends)	\$23.26/Month \$0.02/Mile	\$154.97/Initial Installation \$222.33/Expedited Installation
STS-1 (Both Ends)	\$372.42/Month \$7.49/Mile	\$167.96/Initial and Additional Installation \$238.84/Expedited Initial and Additional Installation
OC-3 (Both Ends)	\$1,129.95/Month 22.92/Mile	\$202.01/Initial and Additional Installation \$288.04/Expedited Initial and Additional Installation
OC-12 (Both Ends)	\$2,840.84/Month \$54.09/Mile	\$202.01/Initial and Additional Installation \$288.04/Expedited Initial and Additional Installation

<u>Service or Element Description:</u>	<u>Recurring Charges:</u>	<u>Non-Recurring Charge:</u>
VI. Unbundled Switching		
a. Local Switching Ports		
POTS/PBX/Centrex	\$0.73/Port/Month	\$7.71/Service Order \$20.42/Installation /Port
ISDN (PRI)	\$71.38/Port/Month	\$52.74/Service Order \$364.47/Installation/Port
ISDN (BRI)	\$4.43/Port/Month	\$7.71/Service Order \$20.42/Installation /Port
DID	\$2.72/Port/Month	\$52.74/Service Order \$364.47/Installation /Port
Unbundled Switched DS1 Port	\$55.65/Port	Initial: \$52.74/Service Order \$364.47/ Installation \$6.64/ Manual Surcharge Expedited: \$75.34/ Service Order \$498.14/ Installation \$9.48Manual Surcharge Additional: \$0.00/Service Order \$185.13/ Installation \$247.25/Expedite
Unbundled IDLC Analog Port	\$67.23/Port	Initial: \$7.71/Service Order \$401.29/ Installation \$20.42/ Manual Surcharge Expedited: \$11.02/ Service Order \$551.36/ Installation \$29.18/Manual Surcharge

<u>Service or Element Description:</u>	<u>Recurring Charges:</u>	<u>Non-Recurring Charge:</u>
Unbundled Public Access Line Port (UPALP)	\$0.73/Port	Initial: \$7.71/Service Order \$20.42/ Installation \$9.31/Additional Installation \$20.42/ Manual Surcharge Expedited: \$11.02/ Service Order \$28.15/ Installation \$12.84/ Additional Installation \$29.18/Manual Surcharge
Unbundled Coin Port (UCP)	\$1.50/Port	Initial: \$7.71/Service Order \$20.42/ Installation \$9.31/Additional Installation \$20.42/ Manual Surcharge Expedited: \$11.02/ Service Order \$28.15/ Installation \$12.84/ Additional Installation \$29.18/Manual Surcharge
Ancillary Features		
Inward Direct Dial Blocking (IDDB)	\$0.03	Not Applicable
Line Side Answer Supervision	\$0.00	Not Applicable
Call Type Blocking	\$0.05	Not Applicable
Inward Screening	\$0.00	Not Applicable
Limited InterLATA Dialing Service	\$0.04	Not Applicable

b. Dedicated Trunk Port

Service or Element Description:**Recurring Charges:****Non-Recurring Charge:**

End Office

\$48.96/Port

Initial:
 \$7.71/Service Order
 \$441.55/ Installation
 \$20.42/ Manual
 Surcharge

Expedited:
 \$11.02/ Service Order
 \$613.21/ Installation
 \$29.18/Manual
 Surcharge

Additional:

\$0.00/Service Order
 \$174.82/ Installation

Expedited:
 \$0.00/ Service Order
 \$233.63/ Installation

Tandem

\$59.07/Port

Initial:
 \$7.71/Service Order
 \$384.18/ Installation
 \$20.42/ Manual
 Surcharge

Expedited:
 \$11.02/ Service Order
 \$530.62/ Installation
 \$29.18/Manual
 Surcharge

Additional:

\$0.00/Service Order
 \$167.36/ Installation

Expedited:
 \$0.00/ Service Order
 \$221.57/ Installation

<u>Service or Element Description:</u>	<u>Recurring Charges:</u>	<u>Non-Recurring Charge:</u>
c. SMDI/MWI/PMSI Port	\$182.85/Port	Initial: \$7.71/Service Order \$345.96/ Installation \$20.42/ Manual Surcharge Expedited: \$11.02/ Service Order \$471.66/ Installation \$29.18/Manual Surcharge
d. Tandem Switching Usage	\$.000674/MOU	Not Applicable
e. Local Switching Usage		
POTS Originating With Vertical Features	\$.002773/MOU	Not Applicable
POTS Terminating With Vertical Features	\$.002508/MOU	
ISDN Originating Digital Switched Voice With Vertical Features	\$.002585/MOU	
ISDN Terminating Digital Switched Voice	\$.001714/MOU	Not Applicable
ISDN Originating Digital Circuit Switched Data	\$.001779/MOU	Not Applicable
ISDN Terminating Digital Circuit Switched Data	\$.001714/MOU	Not Applicable
f. POTS Features		
PBX	\$.005898MOU	Not Applicable
Multi-Line Hunting	\$.000001/MOU	
g. Centrex Features		
UCD	\$.000139/MOU	Not Applicable
Hunting	\$.000237/MOU	
Queuing	\$.000582/MOU	Not Applicable
Intercom & Features	\$.010227/MOU	Not Applicable
Attendant	\$.004390/MOU	Not Applicable
Attendant Console	\$.022142/MOU	Not Applicable
Centralized Attendant Services	\$.020531/MOU	Not Applicable
Attendant Access Code Dialing	\$.003645/MOU	Not Applicable
Automatic Route Selection	\$.003684/MOU	Not Applicable